

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Special Services Fees and Classifications) Docket No. MC96-3

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS W. ASHLEY LYONS
(OCA/USPS-T1-34-35)
(August 12, 1996)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA Interrogatories 1-4 to the United States Postal Service dated June 19, 1996, are hereby incorporated by reference.

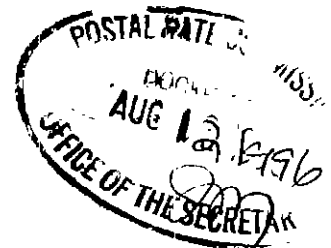
Respectfully submitted,

Gail Willette

GAIL WILLETTE
Director
Office of the Consumer Advocate

David Ruderman

DAVID RUDERMAN
Attorney



OCA/USPS-T1-34. Please refer to your answer to interrogatory OCA/USPS-T1-19.

- a. You state that "[t]he portion of that charge [the 20 cent postal card rate] which relates to the card is not identified separately from the amount of postage." Please confirm that the costs which relate to the card, i.e., the manufacturing costs, are in the attributable costs assigned to postal cards and are covered by the rate paid by postal cards. See, witness Patelunas' answer to OCA/USPS-T5-10.
- b. Please define "postcard" as you use it in your response:
"Moreover the current product name, 'postal card', implies that the product is a postcard."
- c. Please define "card" as used in DMM E110.3.1 - E110.3.3.
- d. "Customers who buy postcards at a post office know that the postcard already has postage on it." Do you agree or disagree with this statement. Please explain your answer.
- e. Please explain what the phrase "clarify the customer's choice" means as you use it in your testimony and response.
- f. Please explain how a separate fee for postal cards "also has the advantage of establishing a sounder cost basis for these products" when all of the costs of the product are currently contained in the attributable costs.


- g. Please refer to section (d) and your answer thereto. Do you believe that Postal Service customers who have bought postal cards for 20 cents and now have to pay 22 cents would not say, if asked, that the rate had increased? Please explain any affirmative answer.
- h. Please assume that the stamped card fee proposal is adopted. Will the customer's choice be either to buy a stamped card for 22 cents or not to buy a card whereas the previous choice was to buy a postal card for 20 cents? Please explain.

OCA/USPS-T1-35. Please refer to your testimony at page 8.

Please explain why expenses for certified mail and return receipt will decline.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 3.B(3) of the special rules of practice.


DAVID RUDERMAN
Attorney

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